

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RUSSELL CARRINGTON,)
 Plaintiff,)
)
 vs.) Civil No: 1:19-cv-03587-ELH
)
JALESSA DORSEY, et al.,)
 Defendants)

)

MOTION FOR SUMMARY JUDGMENT

Hereby plaintiff "RUSSELL CARRINGTON" files his Motion seeking for "SUMMARY OF JUDGMENT" in this U.S District Court in above Civil Case where there is a genuine issue of material facts existed and happened as plaintiff allegedly claimed in his "COMPLAINT" as well as his "Prima Facie Showing of Cause" complying with this Court's Order dated on 02/08/2021.

After the plaintiff's attached herewith motions: (1) Prima Facie Showing of Cause, (2) Declaration for Entry of Default, and (3) Default Judgment were honorably considered and determined by this Court, based on the genuine issue of indisputable material facts, respectfully plaintiff asks this Court to enter its summary judgment against the remaining defendants, Dorsey and France and to hold them to be liable for the redress individually claimed against them in this Civil Action.

Without a doubt that defendant Dorsey voluntarily admitted her misconduct (sexual assault) during her sworn testimony as a government witness on 12/16/2014, see in this Court's "MEMORANDUM" on Page-2 (I.Factual Background), corroborated with a "sexual assault" allegation

individually claimed against the remaining defendants Dorsey and France in a Complaint filed on 12/18/2019 in this Court.

Here, plaintiff respectfully realleges and incorporates by reference all Points: I, II, and III, Supporting Facts, and Authorities allegedly stated in his Motion "Prima Facie Showing Causes" in support of this Motion for "Summary Judgment"; to avoid from repeating of the genuine issue of material facts, points, and authorities where this Court will consider and determine its Summary Judgment.

Additionally, as an "equitable requirement of recovery" for the redress of the plaintiff's Civil and Federal Constitutional Rights prejudicially violated by both defendants: Dorsey and France, plaintiff respectfully asks this U.S District Court to appoint him a pro bono counsel to conduct its investigation of whom will be subject to pay for these individual defendants "Civil & Federal Constitutional Tort Liability" and "Compensatory Damages" as plaintiff demanded in his Civil Action in above mentioned case number.

WHEREFORE, based on the plaintiff's prima facie showing of causes, declaration for entry of default, Default Judgment motions attached herewith for this Court's determination and consideration, plaintiff prays that this Court will grant this Motion for "Summary Judgment" in the interest of justice where the foundation of this country is the rules of law. Respectfully submitted on 02/23/2021 at USP Canaan, Wayne County, a State of Pennsylvania.



RUSSELL CARRINGTON, Pro se Plaintiff

Reg.No.: 57530-037

USP Canaan

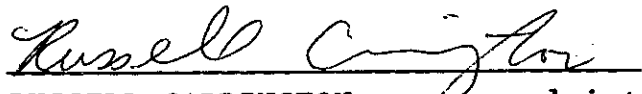
PO Box 300 Waymart, PA 18472.

CERTIFICATE OF SERVICE

I am "Russell Carrington" plaintiff hereby certifying that before 5:00pm as of today date: 02 /26 /2021 I placed the true and correct copies of my motions: (1) Prima Facie Showing of Causes, (2) Declaration for Entry of Default, (3) Judgment of Default, and (4) Summary of Judgment in the properly addressed envelope with duly prepaid postages and mailed at this USP Canaan Mailing Service

F-1 Unit to: Office of the Clerk
U.S District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, MD 21201-2691

I am Russell Carrington hereby certifying under the penalty of perjury in accordance with 28 U.S.C. § 1746 that the foregoing statement made by me in this Certificate of Service is true and correct to the best of my knowledge. Respectfully executed on 02/23/2021 at Wayne County, a State of Pennsylvania in USP Canaan.



RUSSELL CARRINGTON, pro se plaintiff
Reg.No.: 57530-037
USP Canaan
PO Box 300
Waymart, PA 18472.